TITLE	REF	VERSION
Corporate Ethics Policy	CP020	4.0

APPROVAL BODY:	APPROVAL DATE	REVIEW DATE
Corporation	17th July 2026	2nd June 2028

LEAD PERSON	Head of Governance.		
EQIA DATE	30th January 2024	DPIA DATE	30th January 2024

CORPORATE ETHICS POLICY

Policy Statement

Activate Learning is committed to acting in a way that meets the expectations of our funders, customers and communities. Reputation and public trust are important to us and so we are honest, open, and fair in our activities and decision making.

Purpose

This policy sets out our approach to ensuring ethical excellence in our organisation and our responsibilities within that. It also sets out our approach to responding to incidents of misconduct.

Scope

This policy applies to all staff, governors, and volunteers of Activate Learning. This policy also applies to contractors and subcontractors acting on behalf of Activate Learning.

Responsibilities

We are all responsible for maintaining an open, honest, and fair culture in how we deal with students, colleagues, suppliers and customers. We must all protect the reputation of Activate Learning by following the standards of behaviour outlined in this policy, looking out for and quickly reporting any misconduct. This includes avoiding inappropriate or anti-social behaviour outside of the workplace, including behaviour on online and social media platforms.

The Corporation Board are responsible for setting clear standards of behaviour. The Board ensure that those standards are upheld through the Group Executive Team, strong internal controls, and audit arrangements.

Managers are responsible for making the culture and standards of behaviour clear to members of their teams. Managers should consider those standards in recruitment and staff development decisions.

The Head of Governance is responsible for providing advice on this policy, monitoring use of this policy, and maintaining relevant records. The Head of Governance is also responsible for receiving and responding to whistleblowing (see “Whistleblowing” below).

Commitment Statement

Conflicts of Interest

To make sure that decisions are made fairly and openly, we seek to identify and manage factors which may unduly affect decision-makers. A conflict of interest occurs when an individual’s personal interests or loyalties may prevent them from deciding in the best interests of Activate Learning.

Relevant interests may include personal relationships, possible financial gain or loss, and/or external connections or jobs. We must each recognise and report any conflict which may affect decision-making.

You should report any conflict of interest to the Head of Governance, in line with the Conflicts of Interest for Governors Procedure or the Conflicts of Interest for Staff Procedure.

Gifts and Hospitality

From time to time we may be offered gifts and/or hospitality in the course of our work for Activate Learning. Sometimes, these offers may, or may seem to, influence us to make unfair decisions. We must be careful to avoid offers which might have this effect, whilst protecting positive relationships with those we work with. To

do this, we follow careful guidelines as to the types of offers that may be accepted and when they may be accepted.

Offers that are small or of token value are generally acceptable. Larger offers may be acceptable if agreed in advance with the CEO or Chair of the Board. We do not accept any offer which may seem to encourage us to make a certain decision or behave in a certain way. We do not accept gifts of money, or any goods or services offered by suppliers who are involved in a live procurement process.

If you are offered a gift or hospitality, you should refer to the Gifts and Hospitality Procedure in case you need to decline it, report it, or seek permission to accept it.

Bribery and Corruption
We do not tolerate any activity that is intended to unduly influence behaviour or decision-making (corruption), including bribes. We follow internal control systems to prevent such activity, and we are open and honest in our dealings.

We do not make or accept any offer that is intended to gain or recognise any undue benefit. In this case, benefits may include business advantages, educational benefits, or changes to routine processes. We promote honesty and fairness, and we will not punish anyone who refuses to act in a way which compromises those values.

We will make sure that all payments we make are reasonable, fair, and supported by evidence. We will only make or accept donations and sponsorship payments in certain cases, as outlined in the Bribery and Corruption Procedure. If you wish to make or accept a donation or sponsorship payment, you should carefully follow the Procedure. We will keep clear and complete records of any such payments, and all donations and sponsorships will be publicly disclosed.

Fraud
The Chief Operating Officer (COO) makes sure that we have strong internal controls, which are outlined in the Financial Regulations. We must all remember and follow those internal controls. Our finance systems and processes are regularly monitored and reviewed. Our auditors also review these systems, as directed by the Audit and Risk Committee.

We must all look out for fraud and report any suspected or actual fraud to the COO without delay. Activate Learning will investigate any such reports, take action as necessary, and report to the Audit and Risk Committee, in line with the Fraud Response Procedure.

Whistleblowing
We act honestly, openly, and fairly, and welcome reports of any activity that does not meet these standards. We will treat all reports seriously and will fully investigate concerns that are raised. You should raise any concerns with your line manager first, or consult the relevant policy or procedure. If the matter cannot be resolved this way and affects the well-being of the general public, the disclosure and you as the discloser may be protected. If you wish to raise a concern and think it may meet this description, the Whistleblowing Procedure outlines the process for doing so. You can also seek advice from the Head of Governance.

We aim to keep any concern raised under the Whistleblowing Procedure confidential, although we may need to share some details to allow us to investigate the matter. You will not be harmed, punished, or subjected to disciplinary action for raising honest concerns under the procedure. You may access additional support from Occupational Health via HR.

If you require external advice raising concerns that affect the well-being of the general public, you may contact the Protect Charity via the contact details contained in the Whistleblowing Procedure.

Modern Slavery
We believe that everyone has the right to live freely and earn a fair wage for their work. We take steps, recorded in our annual Modern Slavery Statement, to make sure that slavery does not occur in our colleges or partners and we continually review and risk assess our supply chain. We look out for signs of modern slavery among our staff, students and stakeholders; if you suspect that slavery is taking please, you should raise your concerns through the Whistleblowing Procedure.

References

This Policy complies with the following legislation:

- Public Interest Disclosure Act 1998
- Enterprise and Regulatory Reform Act 2013
- Bribery Act 2010
- Charities Act 2011

This Policy should be read in conjunction with the following Activate Learning Policies and Procedures which are available here:

- Gifts and Hospitality Procedure
- Governor Expenses Procedure
- Bribery and Corruption Procedure
- Fraud Response Procedure

- Grievance Procedure
- Risk Management Policy
- Asset Transfer Procedure
- Safeguarding and Child Protection Policy
- Staff Disciplinary Procedure
- Conflicts of Interest for Governors Procedure
- Whistleblowing Procedure